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Document Number:

(140) IV-D-124

Docket Number:

A-90-16

A-90.16 1V-D-124

PLACID REFINING COMPANY

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July 20, 1990

Mr. William K. Reilly
AdministratorUnited States Environmental Protection Agency
401 Main Street, S.W.
Washington, D.C. 20460

AUG 2 1 1990

EPA AIR DOCKET

RE: USE OF MMT IN UNLEADED GASOLINE

Dear Sir:

Placid Refining Company has reviewed the data supplied by Ethyl Corporation for the additive HI TEC 3000 containing MMT (manganese based antiknock). Based on the octane response of 0.8(R+M/2) with the addition of 0.03g MN/gal., our analyses confirms a reduction in reformer severity resulting in a decreased aromatics content of 1.5 percent in the total unleaded pool.

In view of the pending legislation to specify environmentally acceptable gasolines, we feel that octane replacement will be critical. For that reason, Placid Refining Company supports the waiver to permit the use of MMT in unleaded gasoline.

Very truly yours,

PLACID REFINING COMPANY

GBF/cmw12 ; cc: File/Chron. File